

Delegated Report			Expiry Date:	03/08/2015
Officer			Application Number(s)	
Jagdish Akhaja			2015/3210/A	
Application Address			Application Type:	
St Giles Hotel Bedford Avenue London WC1B 3GH			Advertisement Consent	
1st Signature	2nd Signature (If refusal)	Conservation	Recommendation(s):	
			Refuse Advertisement Consent	
Proposal(s)				
Display of 1x digital display screen (6.0 x 39.8 metres) to Tottenham Court Road elevation at 1st and 2nd floor level.				

Consultations

Total objections received – **18** and Comments – **1**

On behalf of Bloomsbury Association
On Behalf of Charlotte Street Association
On Behalf of Covent Garden Community Association
Soho Society 55 Dean Street W1D 6AF
Cllr Adam Harrison - Bloomsbury Ward
TFL - 10th Floor, Windsor House, 42-50 Victoria Street, London SW1H 0TL
The Bedford Estates 29a Montague Street
51 Bedford Court Mansions Bedford Avenue
43a Bedford Court Mansions Bedford Avenue
111 Bedford Court Mansions Bedford Avenue
112 Bedford Court Mansions Bedford Avenue
114 Bedford Court Mansions Bedford Avenue
117 Bedford Court Mansions Bedford Avenue
118 Bedford Court Mansions Bedford Avenue
12A Adeline Place
14 Adeline Place
29-30 Kings Mews
Two anonymous Objections

Bloomsbury Conservation Area Association Comments:

The proposal will have a significant impact on long distance views along Tottenham Court Road and Charing Cross Road, and from public spaces such as the new Plaza being created in front of Centre Point. Contrary to LDF policy, the proposal will be detrimental to the Bloomsbury, Hanway Street and Denmark Street Conservation Areas, particularly in its harmful intrusion into views from Great Russell Street, Bedford Avenue and along Charing Cross Road. Its scale and bulk will also have a damaging visual impact on important local views from adjacent Conservation Areas such as Soho and Covent Garden. It also detracts from the setting of a number of nearby listed buildings, including Lutyens' former YWCA building, Congress House, 5 and 8-12 Great Russell Street, The Dominion Theatre, 279 Tottenham Court Road, and Centre Point, together with 1 Tottenham Court Road and the adjoining 14-16 Oxford Street in Westminster. Light pollution from the proposed media wall will impact on the amenity of residential buildings directly opposite the St Giles Hotel on Great Russell Street and Bedford Avenue. It may also have an effect on residential uses on Hanway Street. The proposed screen presents a risk to public safety in that it is of a size and a prominence that, as is intended, will distract the attention of drivers approaching the junction of Oxford Street from Charing Cross Road. Vehicles often travel at speed along Charing Cross Road and at this point there is a traffic light controlled pedestrian crossing on Tottenham Court Road, which is all too easy for drivers to miss. On implementation of the West End Project, Tottenham Court Road will become two-way and there will be a similar risk to pedestrians crossing at the traffic light-controlled crossing close to Bedford Avenue. This will have a material impact on the appearance of the building, on several conservation areas and on the setting of adjoining listed buildings. There is also the issue of light pollution and the economic impact on retail units on the same frontage.

Summary of consultation responses:

Charlotte Street Association Comments:

Strongest objection to this vulgar visual intrusion into the street scene - more appropriate to Las Vegas than Bloomsbury. It would be seriously detrimental to the residential amenity of those living nearby, damaging to the quality of the adjoining Conservation Area from which it would be clearly visible, and incompatible with the purported objective of the West End project to create a high quality public realm.

Covent Garden Community Association:

The CGCA (Covent Garden Community Association) supports the objections of the Bloomsbury Association and the Bloomsbury CAAC. This site lies just outside of the boundaries of Covent Garden, thus it has an influence on the perception that visitors to the area have. The CGCA strongly objects to the ruthless commercialisation of this high-profile site. The proposals are better suited to an area such as Piccadilly Circus, but not to the historic fabric of this area. Permitting this development would set a powerful precedent that would in effect irreversibly alter the character of one of the most historic areas of Central London, turning it into an excessively commercialised area with dire consequences for area residents and visitors.

Cllr Adam Harrison Comments - Bloomsbury Ward:

Despite the highly urban nature of the context (at least, a large part of it) a screen of such scale is nevertheless overwhelming and inappropriate to the streetscape, all the more so if it wraps around to Great Russell Street and Bedford Avenue and the Bloomsbury conservation areas that start there. The council's ambitions for Tottenham Court Road are to improve it and make it a pleasanter, less intense and more human place to be. This will work against this ambition, and also works against the council's wider ambition of decluttering the streetscape of advertising. I might also add that while the style of the St Giles Hotel may not be to everyone's taste, constant re-ornamenting of it does not improve it and the building would benefit from its own de-cluttering. This too would work against this.

Comments from residents:

- Significant and damaging impact on public safety and amenity.
- Distracting and dangerous to pedestrian, cyclist and drivers.
- Very close to main junction, increased risk to vehicular and road users.
- Site is located on a busy road, in commercial area and tourist zone; hazardous due to the conflicts between pedestrian and vehicular traffic; moreover, ongoing Crossrail project will increase the pedestrian flow.
- Hefty and bulky size, and material harm to the appearance of adjoining Conservation Area's.
- Detrimental and cumulative impact to street and conservation area
- Harm to character, attractiveness of the centre, quality of life of local residents.
- Incongruous and obtrusive addition to an existing building which would unbalance the architectural composition of the host building, surrounding area and nearby grade II listed building.
- Unduly dominant, incompatible with west end project to create a high quality public realm.
- Increase anti-social behaviour, light and noise pollution, and cluttering effect.
- It is contradictory to Camden policies and guidance.

Site Description

The site is located on the corner of Tottenham Court Road and Bedford Avenue and north side of Great Russell Street, it comprises a large mixed use building which is mainly a hotel but also has a casino and commercial properties at the ground floor level.

The site is neither listed building nor in conservation area. Nevertheless, it adjacent to Bloomsbury and opposite Hanway Street Conservation Area, and Charlotte Street Conservation area is located within the less than half a mile radius, by and large the site is almost surrounded by the conservation area. To the south of the building is a Dominion Theatre a Grade II listed building. To the north side is a 8 storey building is an under construction. The proposal is located 85 metres from the junction between Tottenham Court Road and Oxford Street.

The hotel building dates from 1971 and was designed by the architects Elmsworthy Sykes Partnership. The height of the building, - varies from nine storey facing Tottenham Court Road to seven storeys at rear, and up to 10 to 13 in the centre. Historically this site is also known as "YMCA" Building, and 12 Bedford Avenue, 112 and 118 Great Russell Street.

Relevant History

2014/3894/A- Display of an advertisement awning with 2 x illuminated LED sign to the east, west and non-illuminated fascia sign on existing awning and display of 2 x non illuminated fascia sign to the front elevation in connection with St Giles Hotel. **Approved (13/08/2014).**

2013/6357/P - Installation of sliding glass windows to Great Russell Street elevation in connection with hotel (Class C1). **Refused 06/12/2013**

2006/0049/A - Display of an externally illuminated panel sign at ground floor level entrance of the restaurant (Class A3) on the Great Russell Street elevation). **Approved 30/03/2006**

AS9704030- The display of internally illuminated letters at roof level facing Tottenham Court Road, displaying the hotel name – **Refused (20/02/1997)**

9080065- Display of individual internally illuminated lettering on an aluminium fascia box measuring 9.5 x0.75m above the side entrance at Bedford Avenue- **Approved (17/10/1990)**

AD1745(R1)- The display of an individual, internally illuminated letters on the concrete ground floor windows on the Tottenham Court Road frontage. **Refused (10/10/1981)**

AD1623 - The display of two internally illuminated projecting signs measuring 0.61m x 0.46m, one fixed to the Great Russell Street frontage and one to the Tottenham Court Road frontage. **Refused (05/05/1981)**

ASX0105177- Internally illuminated plasma screen sign at 10th floor level on Great Russell Street elevation- **Refused (15/11/2001)**

Relevant enforcement history

EN13/1231- Unauthorised high level fascia sign- **Breach ceased. (14/02/2014)**

EN14/1245 - (a) Signage at second floor level at the corner of Great Russell Street and Tottenham Court Road advertising the YMCA Club; (b) An unauthorised awning and a refrigerator placed on the footpath each day outside 'Sweets from Heaven' on the Tottenham Court Road frontage; (c) Unauthorised 'A' signs outside 'Pomme de Pain', Gala Casino, Coral and 'Sweets from Heaven' also on the Tottenham Court Road frontage of the hotel. **Breach ceased. (26/03/2015)**

Other relevant Applications

2015/1209/A - Tottenham Court Road: Display of a digital illuminated signage measuring 6.6m x 3.4m x 0.4m at 1.9m from ground level.- **Refused and warning of prosecution action to be taken** (24/04/2015)

2014/7092/A - 178 - 182 Camden High Street: Display of 1 illuminated and 2 non illuminated shroud signs. **Refused** (01/12/2014)

2014/0447/A- 17-29 Hawley Crescent: Display of 2 x non-illuminated aluminium fascia signs on east facing building facade and west facing courtyard facade at the existing MTV Headquarters building.- **Refused** (22/04/2014).

Relevant policies

National and Regional Policy

National Planning Policy Framework (2012)

The London Plan March 2015, consolidated with alterations since 2011

LDF Core Strategy and Development Policies

CS5 – Managing the impact of growth

CS14 – Promoting high quality places and conserving our heritage

CS17 – Making Camden a safer place

Development Policies:

DP17 – Walking, cycling and public transport

DP21 – Development connected to the highway network

DP24 – Securing high quality design

DP25 – Conserving Camden's Heritage

DP26 – Managing the impact of development on occupiers and neighbours

Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Camden Planning Guidance 2011 (as amended)

CPG1 (Design) Chapter 3, 8 & 9

CPG6 (Amenity) Chapter 5

Bloomsbury Conservation Area Appraisal (18 April 2011)

Hanway Conservation Area Appraisal (23 March 2011)

Charlotte Street Conservation Area Appraisal (24 July 2008)

Fitzrovia Area Action Plan (paragraph 9.1) adopted

Planning Enforcement Initiative to remove unsightly advertisement hoardings in the Borough- updated 2013.

Assessment

Proposal

The application relates to a horizontal **display of 1x digital display screen (6.0 x 39.8 metres) to Tottenham Court Road elevation at 1st and 2nd floor level**. This screen divided into three different elevations with three screens which wrap around the building, 6 x 3.4 metres to Bedford Avenue (north side), 6 x 33 metres to Tottenham Courts Road (front elevation), and 6 x 3.4 metres to Great Russell Street (south side), all screens are an interconnected which makes total size of one digital display mega screen which is 6 x 39.8 metres with depth in 0.30 metres to all elevations. The proposed screen will stand 4m above pavement level and will cover 1st and 2nd floor levels with an overall advertising area of **238.8sqm**.

The proposal also includes architectural lighting of the building. This is not being accessed as part of the current application and would require planning permission.

The Town and Country Planning (Control of Advertisements) Regulations 2007 permits the Council to only consider amenity and public safety matters in determining advertisement consent applications.

Visual Amenity

Policy CS14 also stresses that the Council is committed to improving Camden's streets and public spaces and encourages respect for local character and promotes high quality, clutter-free design to make streets and public places that are safe and easy to use for all.

Policy DP25 (Conserving Camden's Heritage) states that developments within Conservation Areas should preserve and enhance the character and appearance of the area as well as not permitting developments that it considers would cause harm to the setting of a listed building.

CPG 1, states "signs that are unsympathetically designed can cause significant harm to the building and the local townscape. Signs should relate well to the character, scale and architectural features of the building and respect their local context" and furthermore that "Generally advertisements will only be acceptable at fascia level or below. Advertisements above fascia level can appear visually obtrusive and unattractive..."

The Bloomsbury Conservation Area Appraisal raises concerns over the impacts signage/advertisements have on the conservation area. The statement acknowledges the harm that screens can have on the visual amenity of frontages and the wider conservation area. Such digital screens are not considered acceptable forms of advertising within the Conservation Area because of their size and scale. The guidelines state such display will be resisted where it is considered to detract from the character and appearance of the area. The site is not within Bloomsbury Conservation Area however, it does boarder it.

The Hanway Street Conservation Area Appraisal echoes these concerns and outlines that inappropriate excessive and illuminated signage can have detrimental impact on the character and appearance of the area. The appraisal states that 'building frontages, roads and pavements are all important elements of the public realm and the cumulative impact of small scale additions can have an overall detrimental impact on the character of the area. The site is not within Hanway Street Conservation Area however, it does boarder it.

The Fitzrovia Area Action Plan was introduced to help to shape the future of Fitzrovia by ensuring that growth takes place in a way that balances the need for residential, institutional and commercial uses and minimises harm to residential amenity. It must be noted that the adopted Fitzrovia Area Action Plan states that we will consider serving a discontinuance notice to seek removal of the advertising hoarding in front of the deep shelter entrance on Tottenham Court Road.

Size and location:

The proposed digital sign is to be displayed in a landscape style. The sign would be attached to the building and would wrap around three elevations at 1st and 2nd floor level. The building varies in height with the front elevation contains 9 storey, middle 10 to 13 storey, and rear up to 7 storey. Because of the size, bulkiness, height, illumination and location, the advert would stand out as a very intrusive and incongruous feature in the streetscene. The proposal would be out of keeping with the character and appearance of the streetscape.

The wider streetscape currently suffers from visual clutter from the presence street furniture which includes several public payphones, bus stops, bins, cycle stands, telecommunication cabinets, street trading kiosk, various traffic signs, and free standing advertisements. The proposal media screen would further exacerbate this.

The FAAP initiative to remove large hoarding elsewhere on Tottenham Court Road is also of relevance to the assessment. The current proposal for a larger advertisement would not be consistent with this initiative.

The proposed media screen will be unduly dominant and highly visible on and at the multi junctions from different road/street to Tottenham Court Road and also from the pedestrian crossing points at major junction between Tottenham Court Road/Oxford Street, due to the bulkiness and size of the screen. It is considered that the proposed media wall would be prominent in local and longer views due its size, location, height and extent of projection.

Proposed site is surrounded by Bloomsbury and Hanway Street Conservation Areas. Bloomsbury Conservation Area covers three side of site address and is located with the 10 meters of the building. Views of Bloomsbury Conservation Area and St Giles Hotel are apparent from Tottenham Court Road. It is considered that in these views the proposed advert owing to its size, position, height and illumination would harm view of the Bloomsbury Conservation Area.

Hanway Street Conservation Area located right opposite the large side of proposed advert panel at only 13 meters away. Again there are views of St Giles Hotel in to context of Hanway Street Conservation Area, for example views down Tottenham Court Road from the north. In these views, for the reasons outlined above, it is considered that the setting of Hanway Street Conservation Area is compromised.

The proposed media screen brightness would be 2500 Cd/m² during the day time and 600 Cd/m² during the night time, which exceeds the recommended light emission in CPG1. Recommended light emission and brightness is 600 Cd/m². The level of illumination over the advert of this size is considered to be excessive and would result in light pollution.

To summarise, the proposed mega digital media screen sign, in terms of its size, design and location is not in keeping with the surrounding area and the streetscene and will create visual clutter. It is considered that the proposal would be harmful to the character and appearance of the conservation areas and adjacent buildings and the streetscape contrary to policy CS14 (Promoting high quality places and conserving our heritage)

Such additions are considered to include visual clutter from excessive signage. It is considered that the brightness, size and siting of the proposal would be such that it would be unduly dominant, and cannot be considered as an appropriate/integral feature to this highly prominent elevation. In conjunction with the siting of the adjacent Conservation Area, it is considered that the proposal would fail to preserve or enhance the character and appearance of the adjacent Conservation Area. The Appraisal refers to the number of signage within the conservation area and includes the existing site located on the application sign and states it detracts from the visual amenity of the frontage. The guidelines state that these signs, as is proposed in this application are 'not considered acceptable forms of advertising within the conservation area because of their size and scale'.

Public Safety

The proposed digital display sign would not only be facing onto one of London's main arteries with heavy traffic throughout the day and night and commuted on by cars, public transport, lorries, taxis, motorbikes and bicycles alike, but also fronting the junction of Tottenham Court Road with Oxford Street/Bedford Avenue/Great Russell Street.

Major concerns have been raised for public safety from Transport, Bloomsbury and Charlotte street conservation area advisor committees and local residents. The site located at heart of London and seating at an almost eye level, it can compromised public safety includes drivers, pedestrians, cyclists and other road users. Due to the level of illumination and size of the screen as mentioned above, it could be seen from long distance.

The Council will expect works affecting highways to avoid causing harm to highway safety or hinder pedestrian movement and avoid unnecessary street clutter. The main element of the proposal would be located directly adjacent to arguably the busiest pedestrian environments/route in the borough. It is worth noting that pedestrian flows are projected to increase significantly in the local area once Crossrail trains become operational and once the Council delivers the West End Project which will transform the public realm in the area. The proposal could lead to pedestrians stopping to view the information being advertised on the screens. This would hinder pedestrian movement which would have a detrimental impact on pedestrian comfort and amenity. It could also lead to dangerous situations where pedestrians are forced to walk in the carriageway. This would obviously be hazardous due to conflicts between pedestrians and vehicular traffic.

As such, the development is contrary to policies CS5 (Managing the impact of growth), CS14 (Promoting high quality places and conserving our heritage), DP21 (Development connected to the highway network), DP24 (Securing high quality design).

Conclusion:

The proposed digital sign, by reason of its size, siting, height and method of illumination would result in an overly dominant and incongruous addition which would be detrimental to the character and appearance of the host building, the streetscene, and Bloomsbury and Hanway Conservation Area. The proposal is therefore contrary to policies CS5 (Managing the impact of growth and development) and CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework Core Strategy; and policies DP24 (Securing high quality design) and DP25 (Conserving Camden's Heritage) of the London Borough of Camden Local Development Framework Development Policies.

The proposed digital sign, by reason of its size, siting, height and method of illumination close to a main road and junction, would be likely to distract pedestrians and road users to the detriment of highway and pedestrian safety, contrary to Policy CS11 (Promoting sustainable and efficient travel) of the London Borough of Camden Local Development Framework Core Strategy and Policy DP21 (development connecting to the highway network) of the London Borough of Camden Local Development Framework development Policies.

Recommendation

The application is therefore recommended for refusal.